

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
HAROLD EUGENE CLARK, SR	:	
aka Harold Eugene Clark	:	CASE NO. 1:17-bk-02060
JACKQYLN DALE CLARK	:	
Debtors	:	
	:	
US BANK NATIONAL ASSOCIATION,,	:	
as Trustee, Successor in Interest to	:	
Wachovia Bank, National Association,	:	
(formerly known as First Union National	:	
Bank) as Trustee, for Long Beach	:	
Mortgage Loan Trust 2001-4,	:	
Movant	:	
	:	
v.	:	
HAROLD EUGENE CLARK, SR		
aka Harold Eugene Clark		
JACKQYLN DALE CLARK,		
Respondents		

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted; however, the Joint Debtor, Jackqyln Dale Clark is deceased and title has vested in the Debtor, Harold Eugene Clark.
3. Admitted.
4. Admitted.
5. Admitted on information and belief..
6. Admitted.
7. Proof of the amount of default is demanded at trial and this averment is therefore denied pending Debtor's research of payments made.
8. Proof of the amount of default is demanded at trial and this averment is therefore denied.

9. Proof of amount owed is demanded at trial and this averment is therefore denied.
10. Denied that Movant has demonstrated cause for relief. The Debtor valued the property at \$112,000 on Schedule A of his bankruptcy petition. Movant filed a proof of claim in the amount of \$65,786.23. Movant is protected by an equity cushion of approximately \$46,213.
11. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
Mott & Gendron Law
Attorney ID # 43568
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
doriemott@aol.com